

UNITED STATES BANKRUPTCY COURT FOR THE
WESTERN DISTRICT OF PENNSYLVANIA

IN RE:)	CASE NO. 12-20074-CMB
)	
RONALD J. LUCCI)	
VICKIE G. LUCCI)	CHAPTER 13
)	
DEBTORS)	RELATED DOCUMENT NO.
)	
)	RELATED TO CLAIM NO. 35
NATIONSTAR MORTGAGE, LLC)	
MOVANT)	
)	
VS.)	
)	
RONALD J. LUCCI)	
VICKIE G. LUCCI)	

**DECLARATION REGARDING NOTICE OF MORTGAGE PAYMENT CHANGE AND
CHAPTER 13 PLAN FEASIBILITY**

The undersigned hereby declares that the Plan dated September 11, 2014 is adequately funded for the change in the mortgage payment to Nationstar Mortgage, LLC to the amount of \$1,158.42 effective with the January 1, 2017 payment without reducing the percentage to Unsecured Creditors or amounts to be paid to other Creditors in the plan.

Therefore, no amended Plan is necessary and/or objection to the notice is required.

January 2, 2017

/s/ Edgardo D. Santillan
Edgardo D. Santillan, Esquire
PA ID No. 60030
SANTILLAN LAW FIRM, P.C.
775 Fourth St.
Beaver, PA 15009
724-770-1040
eds@debtlaw.com

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CERTIFICATION OF SERVICE

I, Edgardo Santillan, Esquire of SANTILLAN LAW FIRM, P.C., 775 Fourth St. Beaver, PA 15009 certify:

That I am, and at all times hereinafter mentioned was, more than 18 years of age;

That on the 2nd day of January 2017, **I SERVED A COPY OF THE WITHIN DECLARATION REGARDING MORTGAGE PAYMENT CHANGE AND CHAPTER 13 PLAN FEASIBILITY UPON THE FOLLOWING:**

Ronda J. Winnecour
Chapter 13 Trustee
Suite 3250, USX Tower
600 Grant Street
Pittsburgh, PA 15219
Via CM/ECF email noticing

U.S. Trustee
1001 Liberty Avenue
Liberty Center Suite 970
Pittsburgh, PA 15222
Via CM/ECF email noticing

**Nationstar Mortgage, LLC
c/o KML Law Group, PC
701 Market St. Suite 5000
Philadelphia, PA 19106
Attn: James Warmbrodt, Esq.
Via CM/ECF email noticing**

I certify under penalty of perjury that the foregoing is true and correct.

EXECUTED ON JANUARY 2, 2017

s/ Edgardo D. Santillan
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